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GRENET

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MICHAEL ROMERO,

Plaintiff,

v.

S. S. ELLERY, et al.,

Defendants.

Civil Action No. 3:12-cv-01084 (WHO)(PR)

**JOINT STIPULATION AND ORDER
EXTENDING CASE SCHEDULE**



The parties jointly request and agree to stipulate to a revised schedule in this matter, as presented below. The parties have been cooperatively progressing discovery in this matter. They jointly request the below modifications in order to address the logistics of prison-related discovery, including conducting depositions of inmates and corrections officers who are now dispersed throughout California.

EVENT	CURRENT STRUCTURE	JOINT PROPOSAL
Close of Fact Discovery	November 20, 2015	December 22, 2016
Initial Expert Reports	January 14, 2016	February 11, 2016
Rebuttal Expert Reports	February 11, 2016	March 10, 2016
Close of Expert Discovery	March 10, 2016	April 7, 2016
Dispositive Motions	April 27, 2016	May 12, 2016
Oppositions to Dispositive Motions	May 11, 2016	May 26, 2016
Replies to Oppositions	May 18, 2016	June 2, 2016
Dispositive Motion Hearing	June 1, 2016	June 15, 2016 Or at Court's convenience
Pretrial Conference	August 15, 2016	August 15, 2016
Trial	September 12, 2016	September 12, 2016

DATED: November 4, 2015

Respectfully submitted,

KILPATRICK TOWNSEND & STOCKTON LLP

By: /s/ Benjamin M. Kleinman-Green

BENJAMIN M. KLEINMAN-GREEN

Attorneys for Plaintiff
Michael Romero



1 DATED: November 6, 2015

Respectfully submitted,

2 CALIFORNIA DEPARTMENT OF JUSTICE
3 OFFICE OF THE ATTORNEY GENERAL

4 By: /s/ D. Robert Duncan

5 D. ROBERT DUNCAN

6 Attorneys for Defendants

7 S. ELLERY, P. HARMAN AND B. GRENERT

8
9 **FILER'S ATTESTATION**

10 Pursuant to Civil L.R. 5-1(i)(3) regarding signatures, I, Benjamin M. Kleinman-Green,
11 attest that concurrence in the filing of the document has been obtained from the other signatory. I
12 declare under penalty of perjury under the laws of the United States of America that the foregoing
13 is true and correct. Executed this 4th day of November, 2015, at San Francisco, California.

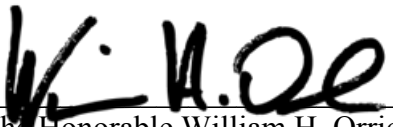
14 /s/ Benjamin M. Kleinman-Green

15 BENJAMIN M. KLEINMAN-GREEN

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19 **ORDER**

20 **IT IS SO ORDERED.**

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24 Dated: November 9, 2015

25 
The Honorable William H. Orrick
United States District Court Judge

